

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION **RECEIVED**

JUN 3 2004

In the Matter of:

PUBLIC SERVICE  
COMMISSION

**THE INTEGRATED RESOURCE PLAN OF  
UNION LIGHT, HEAT, AND  
POWER COMPANY**

**CASE NO. 2004-00014**

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**MOTION TO INTERVENE**

Comes now the Commonwealth of Kentucky, Environmental and Public Protection Cabinet, Division of Energy (KDOE), and pursuant to 807 KAR 5:001 Section 3, requests leave to intervene in the above-styled case, and that it be granted full intervention status.

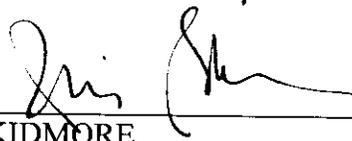
The KDOE has a statutory mandate to “develop and implement programs for the development, conservation, and utilization of energy in a manner to meet human needs while maintaining Kentucky’s economy at the highest feasible level.” (KRS Chapter 224.10-100 (28-29)). KDOE serves as the state energy office for Kentucky and administers a range of programs designed to enhance the efficiency of energy production and use in all sectors of the economy.

KDOE requests leave to intervene in order to provide comments to the Integrated Resource Plan submitted by Union Light, Heat, and Power Company. KDOE has a special interest in this proceeding which is not otherwise adequately represented. KDOE will present

issues or develop facts that will assist the Commission in fully considering this matter without unduly complicating or disrupting the proceedings. The KDOE will adhere to the procedural schedule entered on May 26, 2004.

**WHEREFORE**, KDOE respectfully requests that its motion for full intervention be granted.

Respectfully submitted,



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COUNSEL FOR KENTUCKY  
DIVISION OF ENERGY

**CERTIFICATE OF SERVICE**

I hereby certify that on the 3<sup>rd</sup> day of June, 2004 a true and accurate copy of the foregoing **MOTION** was mailed, postage pre-paid, to the following:

Hon. John J. Finnigan, Jr.  
Senior Counsel  
The Union Light Heat & Power Co.  
139 E. Fourth Street  
Cincinnati, Ohio 45202

Hon. Michael J. Pahutski  
Attorney at Law  
The Union Light Heat & Power Co.  
139 E. Fourth Street  
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Iris Skidmore